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Counsel for Plaintiff International Fur Trade Federation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

INTERNATIONAL FUR TRADE
FEDERATION, an unincorporated
association;

Plaintiff,

– against –

CITY AND COUNTY OF SAN
FRANCISCO; and

DR. GRANT COLFAX, an individual,
in his official capacity as Director of the
San Francisco Department of Public
Health;

Defendants.

Case No. 3:20-cv-00242-RS

**DECLARATION OF MICHAEL
TENENBAUM IN SUPPORT OF
STIPULATION AND
[PROPOSED] ORDER
ADJUSTING HEARING AND
BRIEFING SCHEDULE ON
PENDING MOTIONS**

1 I, Michael Tenenbaum, declare as follows:

2 1. I am a lawyer duly licensed in the State of California. I represent the
3 Plaintiff International Fur Trade Federation (“IFF” or “Plaintiff”) in this action. I have
4 personal knowledge of the facts set forth in this declaration and could competently
5 testify to such facts if called upon to do so. So as to avoid the burden on the Court of
6 multiple declarations, I am filing only this declaration in support of the accompany
7 Stipulation and Proposed Order, having first shared a draft of it with counsel for
8 Defendants and counsel for the Intervenor-Defendants and received no objection to
9 doing so.

10 2. I had been diligently preparing IFF’s motion for summary judgment and
11 was doing so last week when I faced several unanticipated difficulties (among them, a
12 serious medical issue that I would rather not reveal in public court papers), including a
13 delay in obtaining a declaration from a key witness/declarant who was unreachable
14 because his son was just diagnosed with COVID-19.

15 3. I have conferred by email with counsel for Defendants and counsel for the
16 Intervenor-Defendants, and we have continued to cooperate with each other to agree to
17 modify the briefing schedule on IFF’s motion for summary judgment, with a new
18 proposed hearing date and Initial Case Management Conference date, subject to the
19 Court’s discretion and availability, as set forth in the stipulation and proposed order.

20 4. Counsel for the Parties continue to believe that our cross-motions should
21 be heard at the same time and that it will conserve the Court’s and our resources for the
22 Initial Case Management Conference to be held after our potentially dispositive motions
23 are decided; and

24 5. The adjusted schedule will not materially delay the resolution of this case

25 I declare under penalty of perjury of the laws of the United States that the
26 foregoing is true and correct.

27 Dated: May 22, 2020

/s/ Michael Tenenbaum

28 Michael Tenenbaum